United States District Court Southern District of Texas

Case Number: <u>CA - 05 - 1073</u>

ATTACHMENT

DG	Scription.								
	State Cou	rt Re	cord		□ State	Court	Record	l Contin	ued
	□ Administrative Record								
	□ Document continued - Part of								
	Exhibit to:				etter(s) _				
Oth	ner: <u>Ta</u>	<u>b</u>	1 -		Exhil	oits	B-(<u> </u>	·
					·····				

Case 4:05-cv-01073 Document 3-1 Filed in TXSD on 04/19/05 Page 2 of 22

E While (B)

Exhibit B

🚣 __M 5. INVOLUNTARY PETITIO 🛌 🕝

Sout	United Sta		INVOLUNTARY PETITION		
IN RE (Name of Debtor - If i		of Texas, Houston I	ALL OTHER NAM	ES used by debtor in the last 6 years	
Seven Seas Petrole	eum Inc.		(menude numera, na	אוטפון, שווט טעקפ אשוויפג)	
SOC. SEC./TAX I.D. NO. (III	more than one, state a	H)	-		
STREET ADDRESS OF DE	BTOR (No. and street,	city, state, and zip code)	MAILING ADDRES	S OF DEBTOR (If different from street address)	
5555 San Felipe, S Houston, Texas 77			02-4	5206-H2-77	
,	PRI	UNTY OF RESIDENCE OR NCIPAL PLACE OF BUSINESS ris County, Texas		200 112-47	
LOCATION OF PRINCIPAL	ASSETS OF BUSINE	SS DEBTOR (If different from prev	viously listed addresses)		
CHAPTER OF BANKRUPTO	CY CODE UNDER W	HICH PETITION IS FILED			
XI Cha		☐ Chapter 11			
	IN	IFORMATION REGARDING DE	EBTOR (Check applica	ble boxes)	
Petitioners believe: Debts are primarily consun ElDebts are primarily busines		ions A and B)	TYPE OF DEBTOR Individual C Partnership C Orporation Not Publicly Held Other:		
A. TYPE OF BUSINESS (Check One) Professional			B. BRIEFLY DESCRIBE NATURE OF BUSINESS Seven Seas is an independent oil and gas company engaged in the exploration and development of oil and gas properties located in Colombia, South America.		
		VENU		6-100	
petition or for a longer part of			icipal assets in the Distri	ct for 180 days immediately preceding the date of this	
☐ A bankruptcy case concern		eneral partner or partnership is pend		NV DA PONIND	
		NG BANKRUPTCY CASE FILED F THIS DEBTOR (Report information)			
Name of Debtor		Case Number		Date	
Relationship		District		Judge	
 2. The debtor is a potitle 11 of the Un 3.a. The debtor is genunless such debts b. Within 120 days trustee, receiver, substantially all of 	(Check ap eligible to file this erson against whom ited States Code. erally not paying a are the subject of preceding the filing or agent appointe of the property of	GATIONS plicable boxes) petition pursuant to 11 U.S.C m an order for relief may be esuch debtor's debts as they be fa bona fide dispute; or g of this petition, a custodian, d or authorized to take charge the debtor for the purpose of eed or took possession.	come due, , other than a	COURT USE ONLY United States Courts Southern District of Texas FILED DEC 2 0 2002	

301905 vl

HOU:2092683.1

FORM 5 Involuntary Petition

Name of Debtor	Seven	etroleum, Inc.	
Case No.			
		(court use only)	

(See Continuation Sheets attached hereto for signatures of additional Petitioners.)

PETITIO	VING CREDITORS	
Name and Address of Petitioner FamCo Value Income Partners, L.P. Attn: Ken Funsten Funsten Asset Management Company 121 Outrigger Mall Marina del Rey, California 90292	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$9,650,000
Name and Address of Petitioner	Nature of Claim	Amount of Claim
Name and Address of Petitioner Merced Partners Limited Partnership c/o Jim Musel 601 Carlson Parkway Minnetonka, Minnesota 55305	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$10,095,000
Note: If there are more than three petitioners, attach additional under penalty of perjury, petition(s) signatures under the name(s) of attorney(s) and petitioning creditor information	Total Amount of Petitioners' Claims [To Be Determined]	

(See Continuation Sheets attached hereto for information on additional Petitioners.)

HOU.2092683.1

Case 4:05-cv-01073 Document 3-1 Filed in TXSD on 04/19/05 Page 6 of 22

FORM 5 Involuntary Petition

Name of Debtor	Seven	∠etroleum, Inc.
Case No.		
		(aquet una anlu)

(See Continuation Sl	neets for information on additional	Petitioners.)
Name and Address of Petitioner Tamarack International LLC c/o Jim Musel 601 Carlson Parkway Minnetonka, Minnesota 55305	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$2,000,000
Name and Address of Petitioner Simplon Partners, L.P. c/o Thomas McKay T.A. McKay & Co., Inc. 630 Fifth Avenue, Suite 1956 New York, New York 10111	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$2,150,000
Name and Address of Petitioner S.P. Offshore Limited c/o Thomas McKay T.A. McKay & Co., Inc. 630 Fifth Avenue, Suite 1956 New York, New York 10111	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$11,000,000
Name and Address of Petitioner Pamco Cayman Ltd c/o Kurtis Plumer Highland Capital Management, L.P. 13455 Noel Road, Suite 1300 Dallas, Texas 75240	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$5,000,000
Name and Address of Petitioner Pam Capital Funding L.P. c/o Kurtis Plumer Highland Capital Management, L.P. 13455 Noel Road, Suite 1300 Dallas, Texas 75240	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$8,037,000
Name and Address of Petitioner ML CBO IV (Cayman) Ltd c/o Kurtis Plumer Highland Capital Management, L.P. 13455 Noel Road, Suite 1300 Dallas, Texas 75240	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$4,500,000
Name and Address of Petitioner Wholesale Realtor Supply c/o Gabriel Elias 509 Spring Avenue Elkins Park, PA 19027-2616	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$6,835,000
Name and Address of Petitioner Alma Ellas c/o Gabriel Elias 509 Spring Avenue Elkins Park, PA 19027-2616	Nature of Claim 12 1/2 % Notes due 2005 Acquired by transfer from broker	Amount of Claim \$6,100,000

HO	U:209	2683.
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Case 4:05-cv-01073 Document 3-1 Filed in TXSD on 04/19/05 Page 7 of 22

FORM 5 Involuntary Petition

Name of Debtor	Seven	étroleum, Inc.	
Case No.			
		(court use only)	

TRANSFER OF CLAIM Check this box if there has been a transfer of any claim against the debtor by or to any petitioner. Attach all documents evidencing the transfer and any statements that are required under Bankruptcy Rule 1003(a).					
evidencing the transfer	and any statements that are required und	FOR RELIEF			
this petition. Petitioner(s) declare under		ebtor under the chapter of title 11, United States C	ode, specified in		
information, and belief.					
X Signature of Petitioner or R			2.20.02		
Signature of Petitioner or R	Lepresentative (State title)	Signature of Attorney	Date		
FamCo Value Incomer Pa	etners, L.P.	James Donnell / Andrews & Kurth L.L.P.			
Name of Petitioner	Date Signed December, 2002	Name of Attorney Firm (If any)			
Name & Mailing	Attn: Ken Funsten	600 Travis, Suite 4200; Houston, Texas 77002 Address			
Address of Individual Signing in Representative Capacity	Funsten Asset Management Company 121 Outrigger Mall Marina del Rey, CA 90292	(713) 220-4200			
Capacity	,	Telephone No.	· · · · · · · · · · · · · · · · · · ·		
		Totophone 1.0.			
X		X N/A			
Signature of Petitioner or R	epresentative (State title)	Signature of Attorney	Date		
Name of Petitioner	Date Signed December, 2002	Name of Attorney Firm (If any)			
Name & Mailing Address of Individual Signing in Representative Capacity		Address			
Capacity		Telephone No.			
x		x N/A	_		
Signature of Petitioner or R	epresentative (State title)	Signature of Attorney	Date		
Merced Partners Limited					
Name of Petitioner Date Signed		Name of Attorney Firm (If any)			
Italia of I outload	December, 2002		į		
Name & Mailing Address of Individual Signing in Representative Capacity	c/o Jim Musel 601 Carlson Parkway Minnetonka, Minnesota 55305	Address			
		Telephone No.			

Case 4:05-cv-01073 Document 3-1 Filed in TXSD on 04/19/05 Page 8 of 22

FORM 5 Involuntary Petition

Name of Debtor	Seve	, etroleum, Inc.
Case No.		
		(court use only)

	TRANSFI	ER OF CLAIM				
Check this box if there has been a transfer of any claim against the debtor by or to any petitioner. Attach all documents						
evidencing the transfer and any statements that are required under Bankruptcy Rule 1003(a).						
REQUEST FOR RELIEF						
Petitioner(s) request that	an order for relief be entered against the	e debtor under the chapter of title 11, United States (Code, specified in			
this petition.	J	•				
Petitioner(s) declare unde	er penalty of perjury that the foregoing i	is				
	g to the best of their knowledge,					
information, and belief.						
X		X				
Signature of Petitioner or	Representative (State title)	Signature of Attorney	Date			
FamCo Value Income P	artners, L.P.	James Donnell / Andrews & Kurth L.L.P.				
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)				
	December, 2002					
		600 Travis, Suite 4200; Houston, Texas 77002				
Name & Mailing	Attn: Ken Funsten	Address				
Address of Individual	Funsten Asset Management Company					
Signing in	121 Outrigger Mall	· ·				
Representative	Marina del Rey, CA 90292	(713) 220-4200				
Capacity		Talahan				
		Telephone No.	······································			
x		X N/A				
	Representative (State title)	Signature of Attorney	Date			
.						
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)				
	December, 2002					
Nomes & Nothing		A 11				
Name & Mailing Address of Individual	. 0	Address				
Signing in	•					
Representative	•					
Capacity						
		Telephone No.				
	55					
y the same	(Juan	X N/A				
Signature of Petitioner or	Representative (State Michael J. Fr	Signature of Attorney	Date			
Merced Partners Limited	d Partnership Chief Executi	VA Officer				
By: Global Capital Manag	gement, Inc., General Partner					
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)				
	December 17, 2002		ľ			
Name O. N. S. H. III.	de Yes M					
Name & Mailing	c/o Jim Musel	Address				
Address of Individual Signing in Representative	601 Carlson Parkway, Suite 200		\			
Capacity	Minnetonka, Minnesota 55305					
	THE PROPERTY OF THE PROPERTY O	I	ł			

HOU:2092683.1

Case 4:05-cv-01073 Document 3-1 Filed in TXSD on 04/19/05 Page 9 of 22

*FORM 5 Involuntary Petition

Name of Debtor	Sev.	etroleum, Inc.	
Case No.			
		(court use only)	

		atures of additional Petitioners.)	
REQUEST FOR RELIEF			
Petitioner(s) request that	an order for relief be entered against the	debtor under the chapter of title 11, United States C	ode, specified in
this petition.	_		
Petitioner(s) declare unde	r penalty of perjury that the foregoing is		
true and correct according	to the best of their knowledge,		
information, and belief			
	60/		
X Sechan	Allera I Francis	X N/A	
Signature of Positioner or	Personal Property of the Prope	Signature of Attorney	Date
Tamarack International	Representative CHEFT Executive Off	Cel	Date
	gement, L.P., Investment Manager	1	
By: EBF & Associates, L.			
	gement, Inc., General Partner		
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)	· · · · · · · · · · · · · · · · · · ·
TValle of Tellioner	December 17, 2002	Traine of Pritolines i in any	
· 	December 17, 2002		
Name & Mailing	c/o Jim Musel	Address	
Address of Individual	601 Carlson Parkway, Suite 200		
Signing in	Minnetonka, Minnesota 55305		
Representative			
Capacity			
		Telephone No.	
X		X N/A	
Signature of Petitioner or l	Representative (State title)	Signature of Attorney	Date
Simplon Partners, L.P.			
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)	
	December, 2002		
Name & Mailing	c/o Thomas McKay	Address	
Address of Individual	T.A. McKay & Co., Inc.	Audicis	
Signing in	630 Fifth Avenue, Suite 1956		
Representative	New York, New York 10111		
Capacity			
Cupacity		Telephone No.	
· · · · · · · · · · · · · · · · · · ·			
x		X N/A	
Signature of Petitioner or I	Representative (State title)	Signature of Attorney	Date
S.P. Offshore Limited			
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)	
	December, 2002		
37 - 0 37 '''	/ ****		
Name & Mailing	c/o Thomas McKay	Address	
Address of Individual	T.A. McKay & Co., Inc.		
Signing in	630 Fifth Avenuc, Suite 1956 New York, New York 10111		
Representative	Town Tolk, from Tolk 10111		
Capacity		T-IhXI-	
		Telephone No.	

HOU-2092683.1

- Case 4:05-cv-01073 - Document 3-1 Filed in TXSD on 04/19/05 Page 10 of 22

FORM 5 Involuntary Petition

Name of Debtor	Severales Petroleum, Inc.
Case No.	
	(court use only)

x		X N/A	
Signature of Petitioner or Representative (State title)		Signature of Attorney	Date
S.P. Offshore Limited			
	D . 6: 1	71 72	
Name of Petitioner	Date Signed December, 2002	Name of Attorney Firm (If any)	
Name & Mailing Address of Individual Signing in Representative Capacity	c/o Thomas McKay T.A. McKay & Co., Inc. 630 Fifth Avenue, Suite 1956 New York, New York 10111	Address	
21	•	Telephone No.	
× 6/11		V N/A	
X		X N/A	
Signature of Petitioner or I	Representative (State title)	Signature of Attorney	Date
Pamco Cayman Ltd			
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)	
14mile of 1 editioner	December, 2002	Traine of Attorney I mir(if any)	
	December, 2002		
Name & Mailing	c/o Kurtis Plumer	Address	
Address of Individual	Highland Capital Management, L.P.	/ Add cos	
Signing in Representative	13455 Noel Road, Suite 1300	1	
	Dallas, Texas 75240		
Capacity	22110, 1010, 7210		
		Telephone No.	
		X N/A	
X			
Signature of Petitioner or R	Lepresentative (State title)	Signature of Attorney	Date
Dom Conital Funding I D	•		
Pam Capital Funding L.P Name of Petitioner	Date Signed	Name of Attorney Firm (If any)	
Name of Pentioner	December, 2002	Name of Attorney Furni (II any)	
	December, 2002		
Name & Mailing	c/o Kurtis Plumer	Address	
		Address	
Address of Individual	Highland Capital Management, L.P. 13455 Noel Road, Suite 1300		;
Signing in Representative	Dallas, Texas 75240		
Capacity	Danas, 15845 /J440		
		Telephone No.	

FORM 5 Involuntary Petition

Name of Debtor	Several Petroleum, Inc.
Case No.	
	(court use only)

2			
x \		x N/A	
Signature of Petitioner or Representative (State title)		Signature of Attorney	Date
M. CDO IV (Common) I	A.A		
ML CBO IV (Cayman) L	td	Name of Attorney Firm (If any)	
Name of Petitioner	Date Signed December, 2002	Name of Attorney Firm (It any)	
Name & Mailing	c/o Kurtis Plumer	Address	
Address of Individual	Highland Capital Management, L.P. 13455 Noel Road, Suite 1300		
Signing in Representative Capacity	Dallas, Texas 75240		
Capacity		Telephone No.	
		N/A	
X		X N/A	D-4-
X Signature of Petitioner or R	Representative (State title)	Signature of Attorney	Date
Wholesale Realtor Supply			
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)	
	December, 2002		
Name & Mailing	c/o Gabriel Elias	Address	
Address of Individual	509 Spring Avenue	7,0200	
Signing in Representative	Elkins Park, PA 19027-2616		
Capacity		Telephone No.	
X		X N/A	
Signature of Petitioner or R	Representative (State title)	Signature of Attorney	Date
Wholesale Realtor Supply			
Name of Petitioner	Date Signed	Name of Attorney Firm (If any)	
	December, 2002		
Name & Mailing	c/o Gabriel Elias 509 Spring Avenue	Address	
Address of Individual Signing in Representative	Elkins Park, PA 19027-2616		
Capacity			
		Telephone No.	

Case 4:05-cv-01073 Document 3-1 Filed in TXSD on 04/19/05 Page 12 of 22

FORM 5 Involuntary Position

	" #1005 P 006/014	
Name of Debur	Seven Part Petroloum, Inc. P. 006/011	
Cuse No.		
	(come une only)	

(Continuation Sheets for signatures of additional Petitioners.) REQUEST FOR RELIEF Petitioner(s) request that an order for relief be entered against the debtor under the chapter of title 11, United States Code, specified in Petitioner(s) declare under penalty of perjury that the foregoing is true and correct according to the best of their knowledge, information, and bollef. Signature of Petitioner or Representative (State title) Signature of Attorney Date Tamarack International LLC Date Signed Name of Attorney Firm (If any) Name of Petitioner December 2002 c/o Jim Musel Address Nume & Mailing Address of Individual 601 Carlson Parkway Signing in Minnetonka, Minnesota 55305 Representative Capacity Telephone No. momman N/A Signature of Petitioner or Representative (State title) Date Signature of Attorney THEMMS A. MCHAI, DEBLIDENT, T.A. MCKAY L CO ITS GENERAL PARTNER Simplon Partners, L.P. Name of Petitioner Name of Allomey Firm (If any) Date Signed December 20, 2002 Address Name & Mailing c/o Thomas McKav Address of Individual T.A. McKay & Co., Inc. 630 Fifth Avenue, Suite 1956 Signing in New York, New York 10111 Representative Capacity Telephone No. monum N/A Date Signature of Petitioner or Representative (State title) Signature of Attorney THIM AS A. MOKAY ITT AFTERNEY-IN- FACT S.P. Offshore Limited Name of Attornoy Firm (If any) Date Signed
Decumber 2, 2002 Name of Petitioner Address Name & Mailing c/o Thomas McKay Address of Individual T.A. McKay & Co., Inc. 630 Fifth Avenue, Suite 1956 Signing in New York, New York 10111 Representative Capacity Tolephone No.

VERIFICATION BY PETITIONING CREDITOR OF INVOLUNTARY PETITION FOR ORDER FOR RELIEF UNDER CHAPTER ATTITLE 11 UNITED STATES CODE

On behalf of Merced Partners Limited Partnership ("Petitioner"), I certify that:

- 1. Merced Partners Limited Partnership is a Petitioning Creditor in the abovecaptioned involuntary Chapter Case against Seven Seas Petroleum Inc. (the "Debtor").
- 2. The annexed Petition is true and correct according the best of my knowledge, information, and belief.
- 3. The Petitioner holds in excess of \$11,625.00 of 12 1/2% Senior Notes Due 2005 (the "Notes") issued by the Debtor. The Petitioner acquired the Notes from a broker for investment purposes. Petitioner did not acquire the Notes for the purpose of commencing or joining, as a petitioning creditor, in the above-captioned involuntary Chapter H case commenced against the Debtor.
- 4. The Petitioner's claims are not contingent as to liability nor the subject of a bona fide dispute.

Executed December 17, 2002 at Minnetonka, Minnesota.

The Petitioner declares under penalty of perjury that the foregoing is true and correct and that if called as a witness, I could and would testify competently thereto.

Merced Partners Limited Partnership

By: Global Capital Management, Inc., General Partner

Name: M

Michael J. Frey

rincipal Chief Executive Officer

Petitioning Creditor

VERIFICATION BY PETITIONING CREDITOR OF INVOLUNTARY PETITION FOR ORDER FOR RELIEF UNDER CHAPTER 11 TITLE 11 UNITED STATES CODE

On behalf of Tamarack International, Ltd. ("Petitioner"), I certify that:

- 1. Tamarack International, Ltd. is a Petitioning Creditor in the above-captioned involuntary Chapter T case against Seven Seas Petroleum Inc. (the "Debtor").
- 2. The annexed Petition is true and correct according the best of my knowledge, information, and belief.
- 3. The Petitioner holds in excess of \$11,625.00 of 12 1/2% Senior Notes Due 2005 (the "Notes") issued by the Debtor. The Petitioner acquired the Notes from a broker for investment purposes. Petitioner did not acquire the Notes for the purpose of commencing or joining, as a petitioning creditor, in the above-captioned involuntary Chapter II case commenced against the Debtor.
- 4. The Petitioner's claims are not contingent as to liability nor the subject of a bona fide dispute.

Executed December 17, 2002 at Minnetonka, Minnesota.

The Petitioner declares under penalty of perjury that the foregoing is true and correct and that if called as a witness, I could and would testify competently thereto.

Tamarack International, Ltd.

By: Hunter Capital Management, L.P., Investment Manager

By: EBF & Associates, L.P., General Partner

By: Global Capital Management, Inc., General Partner

Name:

Principal

Chief Executive Officer

Petitioning Creditor

HOU:2	101002
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VERIFICATION BY PETITIONING CREDITOR OF INVOLUNTARY PETITION FOR ORDER FOR RELIEF UNDER CHAPTER 11 TITLE 11 UNITED STATES CODE

On behalf of Pamco Cayman Ltd ("Petitioner"), I certify that:

- 1. Pamco Cayman Ltd is a Petitioning Creditor in the above-captioned involuntary Chapter M case against Seven Seas Petroleum Inc. (the "Debtor").
- 2. The annexed Petition is true and correct according the best of my knowledge, information, and belief.
- 3. The Petitioner holds in excess of \$11,625.00 of 12 ½% Senior Notes Due 2005 (the "Notes") issued by the Debtor. The Petitioner acquired the Notes from a broker for investment purposes. Petitioner did not acquire the Notes for the purpose of commencing or joining, as a petitioning creditor, in the above-captioned involuntary Chapter ** case commenced against the Debtor.
- 4. The Petitioner's claims are not contingent as to liability nor the subject of a bona fide dispute.

Executed December	, 2002 at	

The Petitioner declares under penalty of perjury that the foregoing is true and correct and that if called as a witness, I could and would testify competently thereto.

By:	
Pamco Cayman Ltd	
Name:	
Principal	

Petitioning Creditor

HOU:2101007.1

R 42

VERIFICATION BY PETITIONING CREDITOR OF INVOLUNTARY PETITION FOR ORDER FOR RELIEF UNDER CHAPTER ATTITLE 11 UNITED STATES CODE

On behalf of Pam Capital Funding L.P. ("Petitioner"), I certify that:

- 1. Pam Capital Funding L.P. is a Petitioning Creditor in the above-captioned involuntary Chapter M case against Seven Seas Petroleum Inc. (the "Debtor").
- 2. The annexed Petition is true and correct according the best of my knowledge, information, and belief.
- 3. The Petitioner holds in excess of \$11,625.00 of 12 1/2% Senior Notes Due 2005 (the "Notes") issued by the Debtor. The Petitioner acquired the Notes from a broker for investment purposes. Petitioner did not acquire the Notes for the purpose of commencing or joining, as a petitioning creditor, in the above-captioned involuntary Chapter ** case commenced against the Debtor.
- 4. The Petitioner's claims are not contingent as to liability nor the subject of a bona fide dispute.

Executed December	, 2002 at	•
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The Petitioner declares under penalty of perjury that the foregoing is true and correct and that if called as a witness, I could and would testify competently thereto.

Bv:	1	Z			
Pam	Capital Ful	nding L.P.		**************************************	
Nam	-		,		
Princ	cipal				
Nam	ıe:			····	

Petitioning Creditor

HOU:2101008.1	R 43

VERIFICATION BY PETITIONING CREDITOR OF INVOLUNTARY PETITION FOR ORDER FOR RELIEF UNDER CHAPTER ATTITLE 11 UNITED STATES CODE

On behalf of ML CBO IV (Cayman) Ltd ("Petitioner"), I certify that:

- 1. ML CBO IV (Cayman) Ltd is a Petitioning Creditor in the above-captioned involuntary Chapter 21 case against Seven Seas Petroleum Inc. (the "Debtor").
- 2. The annexed Petition is true and correct according the best of my knowledge, information, and belief.
- 3. The Petitioner holds in excess of \$11,625.00 of 12 1/2% Senior Notes Due 2005 (the "Notes") issued by the Debtor. The Petitioner acquired the Notes from a broker for investment purposes. Petitioner did not acquire the Notes for the purpose of commencing or joining, as a petitioning creditor, in the above-captioned involuntary Chapter 1/2 case commenced against the Debtor.
- 4. The Petitioner's claims are not contingent as to liability nor the subject of a bona fide dispute.

Executed De	ecember	. 2002 at	
L'AUCURUM D'	CUCHINICI	. LUUL al	

The Petitioner declares under penalty of perjury that the foregoing is true and correct and that if called as a witness, I could and would testify competently thereto.

Ву:	
ML CBO IV (Cayman) Ltd	
Name:	
Principal	

Petitioning Creditor

HOU:2101011.1

R 44

VERIFICATION BY PETITIONING CREDITOR OF INVOLUNTARY PETITION FOR ORDER FOR RELIEF UNDER CHAPTER AT TITLE 11 UNITED STATES CODE

On behalf of Simplon Partners, L.P. ("Petitioner"), I certify that:

- 1. Simplon Partners, L.P. is a Petitioning Creditor in the above-captioned involuntary Chapter & case against Seven Seas Petroleum Inc. (the "Debtor").
- The annexed Petition is true and correct according the best of my knowledge, information, and belief.
- 3. The Petitioner holds in excess of \$11,625.00 of 12 ½% Senior Notes Due 2005 (the "Notes") issued by the Debtor. The Petitioner acquired the Notes from a broker for investment purposes. Petitioner did not acquire the Notes for the purpose of commencing or joining, as a petitioning creditor, in the above-captioned involuntary Chapter & case commenced against the Debtor.
- 4. The Petitioner's claims are not contingent as to liability nor the subject of a bona fide dispute.

Executed December 20, 2002 at NEW YORK, N.Y.

The Petitioner declares under penalty of perjury that the foregoing is true and correct and that if called as a witness, I could and would testify competently thereto.

Simplon Partners, L.P.

Name: Thomas A. MORAH, PRESIDENT

Principal T.A. MORAH & CO. IAC.

115 COMMENT PARTNER

Petitioning Creditor

VERIFICATION BY PETITIONING CREDITOR OF INVOLUNTARY PETITION FOR ORDER FOR RELIEF UNDER CHAPTER AT TITLE 11 UNITED STATES CODE

On behalf of S.P. Offshore Limited ("Petitioner"), I certify that:

- 1. S.P. Offshore Limited is a Petitioning Creditor in the above-captioned involuntary Chapter M case against Seven Seas Petroleum Inc. (the "Debtor").
- The annexed Petition is true and correct according the best of my knowledge, information, and belief.
- 3. The Petitioner holds in excess of \$11,625.00 of 12 1/2% Senior Notes Due 2005 (the "Notes") issued by the Debtor. The Petitioner acquired the Notes from a broker for investment purposes. Petitioner did not acquire the Notes for the purpose of commencing or joining, as a petitioning creditor, in the above-captioned involuntary Chapter 1/2 case commenced against the Debtor.
- 4. The Petitioner's claims are not contingent as to liability nor the subject of a bona fide dispute.

Executed December 20, 2002 at Mon Your, N.Y.

The Petitioner declares under penalty of perjury that the foregoing is true and correct and that if called as a witness, I could and would testify competently thereto.

By:		10V	<u>~~</u>	~~	<u>w</u>	m		 	_
	S.P. Offsi	hore L	imite	bs		•			
	Name:							 . ——	-
	Principal	112	411	W.	EN-	IN-F	ner		

Petitioning Creditor

Case 4:05-cv-01073 Document 3-1 Filed in TXSD on 04/19/05 Page 20 of 22

Exhibite

Exhibit C

D STATES BANKRUPTCY CC

Southern District of Texas

NOTICE OF COMMENCEMENT OF CASE UNDER CHAPTER 11 OF THE BANKRUPTCY CODE, MEETING OF CREDITORS, AND FIXING OF DATES (Corporation/Partnership Case)

Case Number: 02-45206 - wws Date Filed (or Converted): 12/20/02

Œ.

IN RE:

Seven Seas Petroleum Inc, 73-1468669

ADDRESS OF DEBTOR 5555 San Felipe Suite 1700 Houston, Tx 77056

NAME/ADDRESS OF ATTORNEY FOR DEBTOR Tony M Davis One Shell Piz 910 Louisiana Houston, TX 77002-4995 NAME/ADDRESS OF TRUSTEE

Telephone Number: 713-229-1547 DATE/TIME/LOCATION OF MEETING OF CREDITORS

02/11/2003 at 10:00 AM Suite 3401 515 Rusk Ave Houston, TX 77002 Telephone Number:

[] Corporation [] Partnership

Filing Claims: Deadline to File a Proof of claim is 05/12/03

COMMENCEMENT OF CASE. A petition for reorganization under chapter 11 of the Bankruptcy Code has been filed in this court by or against the debtor named above, and an order for relief has been entered. You will not receive notice of all documents filed in this case. All documents filed with the court, including lists of the debtor's property and debts, are available for inspection at the office of the clerk of the bankruptcy court.

CREDITORS MAY NOT TAKE CERTAIN ACTIONS. A creditor is anyone to whom the debtor owes money or property. Under the Bankruptcy Code, the debtor is granted certain protection against creditors. Common examples of prohibited actions by creditors are contacting the debtor to demand repayment, taking action against the debtor to collect money owed to creditors or to take property of the debtor, and starting or continuing foreclosure actions or repossessions. If unauthorized actions are taken by a creditor against a debtor, the court may penalize that creditor. A creditor who is considering taking action against the debtor or the property of the debtor should review Sec. 362 of the Bankruptcy Code and may wish to seek legal advice. If the debtor is a partnership, remedies otherwise available against general partners are not necessarily affected by the commencement of this partnership case. The staff of the clerk of the bankruptcy court is not permitted to give legal advice.

MEETING OF CREDITORS. The debtor's representative, as specified in Bankruptcy Rule 9001(5), is required to appear at the meeting of creditors on the date and at the place set forth above for the purpose of being examined under oath. Attendance by creditors at the meeting is welcomed, but not required. At the meeting, the creditors may examine the debtor and transact such other business as may properly come before the meeting. The meeting may be continued or adjourned from time to time by notice at the meeting, without further written notice to the creditors.

PROOF OF CLAIM. Schedules of creditors have been or will be filed pursuant to Bankruptcy Rule 1007. Any creditor holding a scheduled claim which is not listed as disputed, contingent, or unliquidated as to amount may, but is not required to, file a proof of claim in this case. Creditors whose claims are not scheduled or whose claims are listed as disputed, contingent, or unliquidated as to amount and who desire to participate in the case or share in any distribution must file their proofs of claim. A creditor who desires to rely on the schedules of creditors has the responsibility for determining that the claim is listed accurately. The place to file a proof of claim, either in person or by mail, is the office of the clerk of the bankruptcy court. Proof of claim forms are available in the clerk's office of any bankruptcy court.

PURPOSE OF CHAPTER 11 FILING. Chapter 11 of the Bankruptcy Code enables a debtor to reorganize pursuant to a plan. A plan is not effective unless approved by the court at a confirmation hearing. Creditors will be given notice concerning any plan, or in the event the case is dismissed or converted to another chapter of the Bankruptcy Code. The debtor will remain in possession of its property and will continue to operate any business unless a trustee is appointed.

For the Court:

Michael N. Milby

Clerk of the Bankruptcy Court PO Box 61288

Houston TX 77208

ptcy Court Date: 01/17/03

FORM B9F 001